

## EMS IMPLEMENTATION STATUS REPORTING

### **I. Overview**

The requirement for DOE sites to implement Environmental Management Systems (EMSs) as part of their Integrated Safety Management Systems was established in February 2001 (DOE N 450.4, later superceded by DOE O 450.1). Several DOE sites have achieved this, many others have made significant progress toward this goal.

The process of implementing an environmental management system, or -- in the case of DOE sites -- ensuring that the elements of an EMS are fully integrated into the site ISM, involves many steps.

- A generic set of key EMS elements is identified in EPA guidance at <http://www.epa.gov/ems/info/sme4.htm>, and in Chapter 2 “Getting Started” of the *EMS Primer for Federal Facilities*, issued by DOE and EPA at <http://tis.eh.doe.gov/oepa/guidance/ems/emsprimer.pdf>.
- Specific EMS elements required by DOE O 450.1 are identified in Attachment 3 of DOE G 450.1-1, issued for use on October 24, 2003.  
<http://tis.eh.doe.gov/oepa/guidance/ems/emstraining.pdf>

### **A few key metrics were identified for the Federal Government EMS Scorecard**

Executive Order 13148 (implemented within DOE by DOE O 450.1) establishes a date of December 31, 2005, for all appropriate federal sites to implement an EMS. The Office of the Federal Environmental Executive (OFEE) (within the Council on Environmental Quality) prepares a scorecard each year, to measure agency progress toward this goal. The OFEE has identified a several key metrics for Federal agencies to report.

To support DOE’s reporting requirements under E.O. 13148 and DOE O 450.1, DOE has adopted these metrics. This information will also assist DOE leadership in assessing how the Department is implementing its responsibility to implement EMS, and how program offices are implementing their responsibility to ensure that sites under their purview have implemented EMS by December 31, 2005.

### **II. Key EMS Metrics Identified**

The following discussion addresses the site-specific questions (metrics) identified by the OFEE, and references some of the available guidance.

#### **FY03 Metric: Site EMS Policy Statement Issued.**

For DOE, this question means: If a site has an ISMS, has it signed and issued a site EMS policy statement? This need not be a “stand-alone” document; for example, it may be part of an integrated policy statement for the site environment, safety and health management system. But a generic ISMS policy statement is not likely to meet this criterion. For purposes of the Department’s annual E.O. 13148 Report and the OFEE’s

Federal agency Scorecard, the policy statement needs to specifically address EMS. The EMS Policy Statement is discussed further in Section 6.1 of DOE G 450.1-1 (issued for use on October 24, 2003 <http://tis.eh.doe.gov/oepa/guidance/ems/emstraining.pdf>). A general discussion of EMS policy statements is also provided in Chapter 4 of EPA's EMS Guide at <http://www.epa.gov/OW-OWM.html/iso14001/ems2001final.pdf>.

**FY03 Metric: EMS implementation training provided to the personnel establishing EMS.**

For DOE, this question means: If a site has an ISMS, has it conducted EMS training for the staff who will ensure the integration of EMS elements into the ISMS. This presupposes that top management has endorsed the process, and has identified the staff responsible for integrating EMS elements into the ISMS. These initial steps are described in Section 7 of DOE G 450.1-1 (issued for use on October 24, 2003). They are also described in Section 3 of the EPA EMS Guide at <http://www.epa.gov/OW-OWM.html/iso14001/ems2001final.pdf>, as well as Chapter 2 of the DOE/EPA Primer at <http://tis.eh.doe.gov/oepa/guidance/ems/emsprimer.pdf>.

Sites need to identify for themselves what training is necessary for the staff responsible for integrating EMS elements into ISMS to be successful at that task. It would likely include somewhat detailed training about EMS elements and documenting implementation of EMS elements.

Training has been offered by Regional EPA offices, as well as by private vendors and consultants. EMS implementation training materials have been made available by EPA.

**FY03 Metric: Significant environmental aspects Identified.**

For DOE, this question means: If a site has an ISMS, has the site conducted a process to identify the environmental aspects of their activities, and identified which of these aspects are significant? This process results in a documented list of significant environmental aspects, which is used to establish environmental objectives and targets, and to establish appropriate hazard controls for any activities which could result in environmental impacts of concern. The process of identifying significant environmental aspects is described Section 4 of the EPA Guide at <http://www.epa.gov/OW-OWM.html/iso14001/ems2001final.pdf>.

**FY04 Metric (draft): Measurable environmental objectives and targets established.**

Once the significant environmental aspects of the site's activities are identified, the site is to establish (and document) measurable environmental objectives and targets. Objectives and targets are to be reflected in the annual goals and performance measures established as part of the ISMS annual review. Guidance on establishing environmental objectives and targets is included in Section 4 of the EPA guide at <http://www.epa.gov/OW-OWM.html/iso14001/ems2001final.pdf>.

**FY04 Metric (draft): EMS awareness training program established.**

When ISMS was implemented at sites, training was provided to all workers about the management system, and how it affects them. Once the ISMS (procedures, and system description document) is modified to include EMS elements, such awareness training is again appropriate. Training is discussed in Section 4 of the EPA Guide at <http://www.epa.gov/OW-OWM.html/iso14001/ems2001final.pdf>. The purpose of the awareness training is to inform all employees of the revised management system, and how it affects them.

**FY05 Metric (draft): All EMS procedures established (e.g., objectives and targets, aspects and impacts, corrective action, self-assessment, management review).**

For DOE sites, this means that

- existing ISMS documents and procedures have been systematically reviewed and revised to ensure that they fully and explicitly incorporate EMS elements pursuant to DOE O 450.1;
- any new procedures (such as identification and documentation of significant environmental aspects, and establishing environmental objectives and targets) are complete;
- these changes are reflected in a revised ISM system description document (per DOE O 450.1).

**FY05 Metric (draft): Appropriate facilities have EMS in place, and have completed the Self Declaration Protocol in accordance with agency policy or have obtained third-party certification.**

For DOE sites, this means that they have

- obtained third-party registration of their EMS (several DOE sites are registered as conforming to the ISO 14001 Standard), OR
- been recognized by the EPA National Environmental Performance Track (NEPT) as having implemented an effective EMS, OR
- they have undergone a review, demonstrating to the satisfaction of the DOE Contracting Official/ Program Official, that the EMS elements required by DOE O 450.1 are in place and effectively implemented as part of the ISMS (where applicable).

### **III. Summary**

Available guidance, as noted above, outlines generic EMS elements and implementation steps, which need to be adapted to the needs of a specific site. The metrics identified by the OFEE reflect a few key activities which were seen as essential and representative steps along the way. Sites which have developed, or are in the process of developing a systematic process for implementing the requirements of DOE O 450.1, consistent with existing guidance, should have little difficulty knowing when these metrics are achieved.